

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

IN RE:)	Chapter 13
Troy A Anderson)	
)	CASE NO: 20-81111
)	Judge Thomas M. Lynch
Debtor(s))	

NOTICE OF MOTION

TO: Patrick Layng, Ch 13 Trustee, via ECF

Lydia Meyer, US Trustee, via ECF

Attached Service List, via ECF Filing.

PLEASE TAKE NOTICE that on February 3, 2022, at 9:00 a.m., I will appear before the Honorable Judge Thomas M. Lynch, or any judge sitting in that judge's place, and present the Motion to Allow the Sale of Property Under 11 U.S.C. 363, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password. The meeting ID for this hearing is 160 291 5226 and the password is 852255. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Jacob E. Maegli, 6317153
Attorney for Debtor(s)

Jacob E. Maegli, ARDC # 6317153
Pratt & Maegli Law Firm, P.C.
5411 E. State St., Suite 202
Rockford, IL 61108
(815) 315-0683
Rockford@jordanpratt.com

CERTIFICATE OF SERVICE

The undersigned attorney certifies that the above and foregoing notice and attached pleadings to be served upon the following persons by mailing a true copy thereof, addressed as aforesaid, as denoted, on January 17, 2022, before the hour of 5:00 p.m.:

Troy A Anderson
102 Brandywine Drive SE
Poplar Grove, IL 61065
First Class Mail

U.S. Bank National Association
c/o Codilis & Associates, P.C.
Attn: Brenda Ann Likavec
15W030 N Frontage Road
Burr Ridge, IL 60527
First Class Mail

RRB Finance/CNAC of Rockford
c/o Barrick Switzer Long Balsley & Van Evera
Attn: Darron M Burke
6833 Stalter Drive
Rockford, IL 61108
First Class Mail

and to the following persons via electronic notice through ECF

Lydia Meyer, Chapter 13 Trustee
Patrick S. Layng, U.S. Trustee

SEE ALSO THE ATTACHED LIST

_____/s/ Jacob E. Maegli
Attorney for Debtor(s)

ATTORNEYS FOR DEBTOR(S)
PRATT & MAEGLI LAW FIRM, P.C.
Jacob E. Maegli, #6317153
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MOTION TO ALLOW THE SALE OF PROPERTY UNDER 11 U.S.C. 363

NOW COMES the debtor, Troy A Anderson (“Debtor”), by and through his attorney, Pratt & Maegli Law Firm, P.C., and for his Motion to Allow the Sale of Property Under 11 U.S.C. 363, and in support thereof, hereby states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334 and this motion is a “core proceeding” under 28 U.S.C. § 157.
2. Debtor filed a Petition for relief under Chapter 13 of the Bankruptcy Code on June 15, 2020. The Plan was confirmed on September 24, 2020.
3. Debtor wishes to sell his interest in the property located at 102 Brandywine Dr., Poplar Grove, Illinois 61065, Property I.D. 0326181017 (“Property”) pursuant to the attached contract. *See* Exhibits 1-3, Contract for Sale and Purchase.
4. The Property is encumbered by a first mortgage held by U.S. Bank National Association.
5. Prior to closing, an updated payoff shall be obtained from the holder of the first mortgage lien and that lien shall attach to the sales proceeds of the Property.
6. The sales proceeds shall be used to pay the outstanding balance on the first mortgage lien on the date of closing, prior to any other distributions.
7. Any remaining proceeds from the sale, after the first mortgage lien and all ordinary and customary closing costs are paid in full, shall be retained by Debtor, Troy A Anderson.

WHEREFORE, Debtor asks this court for an order allowing Debtor to sell his interest in the property located at 102 Brandywine Dr., Poplar Grove, Illinois 61065, Property I.D. 0326181017. The sales proceeds shall be used to pay the outstanding balance on the first mortgage lien on the date of closing, prior to any other distributions. Any remaining proceeds from the sale, after the first mortgage lien and all ordinary and customary closing costs are paid in full, shall be retained by Debtor, Troy A Anderson. Debtor shall use the sales proceeds to cure the default in Trustee payments within ten (10) days of closing. All other Chapter 13 provisions shall remain the same. The Plan shall remain a 100% Plan.

Respectfully submitted,

By: /s/ Jacob E. Maegli
Attorney for Debtor(s)

ATTORNEYS FOR DEBTOR(S)

PRATT & MAEGLI LAW FIRM, P.C.

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